

# **ATTACHMENT F**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

JAMES RODDEN, *et. al.*,

*Plaintiffs,*

v.

ANTHONY FAUCI, *et. al.*,

*Defendants,*

Civil Action No. : 3 :21-cv-00317

**DECLARATION OF SAM PAPPAS SUPPORTING PLAINTIFFS**

I, Dr. Sam Pappas, declare as follows:

1. I am an adult of sound mind and make this statement voluntarily, based upon my own personal knowledge, education, and experience.
2. Based on my training and experience, I have formed an opinion on the reasonableness of the requested accommodations and on the possibility of other accommodations not listed to a reasonable degree of scientific certainty.

**EXPERIENCE & CREDENTIALS**

3. I am a doctor of internal medicine in Vienna Virginia, where I run my own practice.
4. I went to medical school at Pennsylvania State College of Medicine from 1991 to 1995 and completed my residency in Internal Medicine from University Hospitals/Case Western Reserve in 1999.
5. I then worked as an Assistant Program Director for an Internal Medicine Residency Program at Saint Barnabas Hospital in Livingston, NJ from 1999 until 2003 and then at UMDNJ-

Newark in Newark, NJ from 2003 until 2004. From 2004 until 2012 I was a partner in a large Internal Medicine Practice in Arlington, VA.

6. In 2012, I formed the Primary Care McLean Group under the leadership of Virginia Hospital Center, for which I was chosen as lead physician and where I practiced until the summer of 2016.

7. After that, I opened my own practice, Pappas Health, because I sought to offer a greater variety of services and more meaningfully connect with patients.

8. I am receiving no compensation for my assistance with this case.

9. I have routinely over my 20 + years of practice in the field of Internal Medicine been involved in the care of patients with a variety of infectious diseases and regularly order and assess laboratory testing to help diagnose and treat them.

10. I have reviewed the SARS-CoV-2 specific antibody lab results of the following Plaintiffs in this case:

- a. Michelle Ruth Morton
- b. Waddie Burt Jones
- c. Isaac Lee McLaughlin
- d. Gabriel Escoto
- e. James Joseph Rodden
- f. Ryan Charles Biggers
- g. Carole LeAnn Mazzacapo
- h. Edward Bryan Surgeon
- i. Susan Reynolds
- j. Roy Kenneth Egbert, II

k. George Gammon

11. In my professional opinion, there is no doubt that, based on recent testing, the abovenamed Plaintiffs show evidence of positive SARS-CoV-2 antibodies to both the spike protein and the nucleocapsid protein.

12. The latter is not found in vaccinated individuals, but rather only in those who have previously been infected with the SARS-CoV-2 virus. The existing clinical literature overwhelmingly indicates that the protection afforded to the individual and community from natural immunity is as effective and durable as the efficacy levels of the most effective vaccines to date.

13. From the point of view of Plaintiffs' personal health, there is no good reason that they should be vaccinated.

14. I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge, the foregoing is true and correct this 3<sup>rd</sup> Day of November, 2021, at Vienna, Virginia.

Respectfully submitted,

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Dr. Sam Pappas, M.D.  
Doctor of Internal Medicine